

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Altair Nanotechnologies Sec. Litig.

1:14-cv-07828-AT

CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff Fu Guantong and named plaintiff David Helfenbein ("Plaintiffs"), on behalf of themselves and the Class, respectfully move this Court, under Rule 23(e), for an order (the "Preliminary Approval Order"):

- (1) preliminarily approving the settlement set forth in the Stipulation of Settlement dated November 30, 2015 (the "Stipulation"), resolving this Action against all Defendants in exchange for a payment of \$1.5 million for the benefit of the Class (the "Settlement");
- (2) preliminarily certifying a class, for settlement purposes only, of all persons who purchased or otherwise acquired Altair common stock between May 15, 2013 and September 25, 2014, both dates inclusive;
- (3) appointing Strategic Claims Services as Claims Administrator;
- (4) approving the form and manner of disseminating notice to the Class;
- (5) scheduling a hearing to consider final approval of the Settlement and an award of attorneys' fees and expenses; and
- (6) setting deadlines for the dissemination of notice, the submission of proofs of claim and requests for exclusion, and the filing of objections and papers in support of the settlement.

In support of the motion, Plaintiffs are contemporaneously filing Plaintiffs' Memorandum of Law in Support of Preliminary Approval of Class Action Settlement and the Declaration of Murielle J. Steven Walsh, with exhibits thereto. Defendants do not oppose the motion.

Dated: December 3, 2015

Respectfully submitted,

/s/ Jeremy A. Lieberman

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